

## October 23, 2002

L-2002-187 10 CFR 50.90

U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D. C. 20555

RE: St. Lucie Units 1 and 2

Docket Nos. 50-335 and 50-389 Proposed License Amendments

Addition of Cask Pit Spent Fuel Storage Racks

Technical Specification Requirements

Pursuant to 10 CFR 50.90, Florida Power and Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 for St. Lucie Unit 1 and NPF-16 for St. Lucie Unit 2 by incorporating the attached Technical Specification (TS) revisions. The proposed amendments would revise TS Section 5.6, Design Features — Fuel Storage, to include the design of a new cask pit spent fuel storage rack for each unit and increase each unit's spent fuel storage capacity by combining the cask pit rack and existing spent fuel pool storage rack capacities.

Please note that the Unit 2 amendment request includes a change in FPL's commitments regarding the Unit 2 spent fuel cooling system design basis described in the Updated Final Safety Analysis Report (UFSAR). A current UFSAR commitment regarding the Unit 2 peak spent fuel pool temperature limit during full core offloads with minimum SFP cooling will be replaced with a new design basis as described in the attached evaluation.

These amendment requests also support reducing the core offload time after reactor shutdown to 120 hours. A technical evaluation of the SFP cooling system performance during 120-hour partial and full core offloads demonstrates acceptable SFP temperatures.

Attachment 1 is an evaluation of the proposed changes. Attachment 2 is the "Determination of No Significant Hazards Consideration." Attachments 3 and 4 contain the affected Technical Specifications pages marked-up to show the proposed changes. Attachment 5 contains the word-processed TS changes.

A proprietary and a non-proprietary version of the supporting Holtec License Amendment Report for the new cask pit racks have been provided as Enclosures 1 and 2. Enclosure 1 contains information that is considered proprietary pursuant to 10 CFR 2.790. Enclosure 2 contains the non-proprietary version. The affidavit required by 10 CFR 2.790 is also included within Enclosure 1. FPL requests that the proprietary version of Enclosure 1 be withheld from public viewing.

The St. Lucie Facility Review Group and the FPL Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR 50.91(b)(1), copies of the proposed amendments are being forwarded to the State Designee for the State of Florida.

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Regarding the proposed schedule for these amendments, it is requested that issuance be no later than October 28, 2003. However, it is anticipated that frequent meetings with NRC staff can improve that schedule by several months. Although physical installation of the cask pit racks is not planned until July 2004, the requested amendment date is necessary to provide time for pursuing another spent fuel storage alternative should the submittal not be approved by that date. Based on an expected three-year lead time for any spent fuel storage alternative (dry storage may be longer), and a need for additional storage at St. Lucie Unit 1 prior to losing full core reserve in 2005, it is important to have a definitive storage solution licensed in 2003.

These proposed license amendments may require noticing with respect to the hybrid hearing procedures under 10 CFR 2.1107, because this may involve a proceeding on an application for a license amendment falling within the scope of Section 134 of the Nuclear Waste Policy Act of 1982.

Please contact us if there are any questions about this submittal.

Yery truly yours,

Donald E Jernigan Vice President St. Lucie Plant

DEJ/KWF

Attachments Enclosures

cc: Mr. W. A. Passetti, Florida Department of Health

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STATE OF FLORIDA ) ss. COUNTY OF ST. LUCIE )

Donald E. Jernigan, being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power and Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information and belief, and that he is authorized to execute the document on behalf of said Licensee.

Donald E. Jernigan

STATE OF FLORIDA

COUNTY OF St. Lucy

Sworn to and subscribed before me

this  $\frac{23}{2}$  day of  $\frac{90}{2}$ , 2002

Jedii J. Whowell

by Donald E. Jernigan, who is personally known to me.

Signature of Notary Public-State of Florida

Leslie J. Whitwell
MY COMMISSION # DD020212 EXPIRES
May 12, 2005
BONDED THRU TROY FAIN INSURANCE, INC.

Name of Notary Public (Print, Type, or Stamp)